

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

IN THE MATTER OF:

Fritz Products, Incorporated
255 Marion Road
River Rouge, Michigan 48218

ATTENTION:

William Elson
Vice President

Request to Provide Information Pursuant to the Clean Air Act

The U.S. Environmental Protection Agency is requiring Fritz Products Incorporated (Fritz) to submit certain information about its plant in River Rouge, Michigan ("the facility"). Appendix A provides the instructions needed to answer this information request, including instructions for electronic submissions. Appendix B specify the information that you must submit. You must send this information to us according to the schedule contained in each appendix.

We are issuing this information request under Section 114(a) of the Clean Air Act (CAA), 42 U.S.C. § 7414(a). Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Air and Radiation Division, Region 5.

Fritz owns and operates emission sources at the River Rouge, Michigan facility. We are requesting this information to determine whether your emission source is complying with the Clean Air Act and the National Emissions Standards for Hazardous Air Pollutants for Secondary Aluminum Production in 40 C.F.R. § 63 Subpart RRR.

Fritz must send all required information to Letuchy.alexandra@epa.gov and R5AirEnforcement@epa.gov.

Fritz must submit all required information under an authorized signature with the following certification:

I certify under penalty of law that I have examined and am familiar with the information in the enclosed documents, including all attachments. Based on my inquiry of those individuals with primary responsibility for obtaining the information, I certify that the statements and information are, to the best of my knowledge and belief, true and complete. I am aware that there are significant penalties for knowingly submitting false statements and information, including the possibility of fines or imprisonment pursuant to Section 113(c)(2) of the Clean Air Act and 18 U.S.C. §§ 1001 and 1341.

As explained more fully in Appendix C, you may assert a claim of business confidentiality under 40 C.F.R. Part 2, Subpart B for any part of the information you submit to us. Information subject to a business confidentiality claim is available to the public only to the extent, and by means of the procedures, set forth at 40 C.F.R. Part 2, Subpart B. If you do not assert a business confidentiality claim when you submit the information, EPA may make this information available to the public without further notice. You should be aware, moreover, that pursuant to Section 114(c) of the CAA and 40 C.F.R. § 2.301(a) and (f), emissions data, standards and limitations are not entitled to confidential treatment and shall be made available to the public notwithstanding any assertion of a business confidentiality claim. Appendix C provides additional information regarding the meaning and scope of the term “emissions data.”

This information request is not subject to the Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

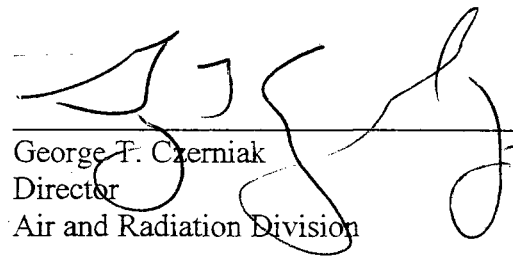
We may use any information submitted in response to this request in an administrative, civil or criminal action.

Failure to comply fully with this information request may subject Fritz to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413.

You should direct any technical questions about this information request to Alexandra Letuchy at (312) 886-6035 or at letuchy.alexandra@epa.gov. Any legal questions should be directed to Cynthia King, Associate Regional Counsel, at (312) 886-6831 or at king.cynthia@epa.gov.

Date

4/29/16


George T. Czerniak
Director
Air and Radiation Division

Appendix A

When providing the information requested in Appendix B, use the following instructions for electronic submissions and definitions.

Electronic Submissions

To aid in our electronic recordkeeping efforts, we request that you provide all documents responsive to this information request in an electronic format according to paragraphs 1 through 6, below. These submissions are in lieu of hard copy.

1. Provide all responsive documents in Portable Document Format (PDF) or similar format, unless otherwise requested in specific questions. If the PDFs are scanned images, perform at least Optical Character Recognition (OCR) for "image over text" to allow the document to be searchable. Submitters providing secured PDFs should also provide unsecured versions for EPA use in repurposing text.
2. When specific questions request data in electronic spreadsheet form, provide the data and corresponding information in editable Excel or Lotus format, and not in image format. If Excel or Lotus formats are not available, then the format should allow for data to be used in calculations by a standard spreadsheet program such as Excel or Lotus.
3. Provide submission on physical media such as compact disk, flash drive or similar item.
4. Provide a table of contents for each disk or drive so that each document can be accurately identified in relation to your response to a specific question. We recommend the use of electronic file folders organized by question number. In addition, each compact disk or flash drive should be labeled appropriately (e.g., Company Name, Disk 1 of 4 for Information Request Response, Date of Response).
5. Documents claimed as confidential business information (CBI) must be submitted on separate disks/drives apart from the non-confidential information. This will facilitate appropriate records management and appropriate handling and protection of the CBI. Please follow the instructions in Appendix C for designating information as CBI.
6. Certify that the attached files have been scanned for viruses and indicate what program was used.

Definitions

All terms used in this information request have their ordinary meaning unless such terms are defined in the CAA, 42 U.S.C. §§ 7401 *et seq.*

1. The terms "document" and "documents" shall mean any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these. If in computer format or memory, each such document shall be provided

in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents in hard copy should also include attachments to or enclosures with any documents.

2. The terms “relate to” or “pertain to” (or any form thereof) shall mean constituting, reflecting, representing, supporting, contradicting, referring to, stating, describing, recording, noting, embodying, containing, mentioning, studying, analyzing, discussing, evaluating or relevant to.
3. The term “person” or its plural or any synonym thereof, is intended to and shall embrace and include any individual, partnership, corporation, company, association, government agency (whether federal, state, local or any agency of the government of a foreign country) or any other entity.
4. The terms “you” and/or “your” shall mean Fritz, and all its agents, servants, employees, representatives, investigators, accountants, auditors, attorneys, experts, consultants, contractors, and others who are in possession, custody, or control (actual or constructive), or that is otherwise available to you, of relevant information, or may have obtained information for or on behalf of Fritz.

Appendix B

Fritz must respond to this information request pursuant to Section 114(a) of the CAA, 42 U.S.C. § 7414(a) by performing testing at its facility. Fritz must submit an emission test plan, conduct emission testing, and submit all other information requested in accordance with the schedule specified below:

Submit Testing Protocol(s)	Within 30 days of receipt of this request
Notification of Intent to Test	Not less than 21 days before testing
Complete Testing	Between June 1st and June 30st
Submit Testing Report	Within 60 days of completion of testing

1. Between June 1st and June 31st, Fritz must perform an emissions test at the reverberatory furnace in accordance with 40 C.F.R. § 63.1511(b) to quantify the mass emission rate of dioxin furans (D/F) in grains of D/F toxic equivalency (TEQ) per ton of feed/charge. The mass emission rates shall be determined by performing testing using EPA Reference Methods 1, 2, 3, 4, 5, and 23.
2. During the testing conducted pursuant to Item 1 above, Fritz shall feed powered activated carbon at a rate of 3.5 pounds per hour.
3. Within 30 days after receipt of this request, Fritz shall submit to EPA the proposed testing protocol(s) that completely describes the methods and procedures for testing at each unit, including all relevant operating parameters. Fritz shall conduct the required testing under a protocol approved in advance by EPA. The protocol shall address the requirements of Item 1-2 of this information request. Specifically, the protocol shall include the:
 - a. Activated carbon injection rate.
 - b. Locations of carbon injection.
 - c. Manufacture specifications for minimum carrier fluid flowrate or pressure drop.
 - d. Brand and type of carbon used.
 - e. Other parameters that affect carbon adsorption.
4. At least 21 days prior to the planned test date(s), Fritz shall submit notification to EPA of its intent to perform emission testing. You may submit this notice by e-mail.
5. Within 60 days after completion of the tests required by this information request, Fritz shall submit a complete report of the emissions testing on its facility, including, at a minimum, the following:
 - a. Summary of Results
 1. Results of the above specified emission tests;
 2. Process and control equipment data related to determining compliance, including fabric filter pressure drops at each baghouse, reactive chlorine flux rate, lime feed rate, powdered activated carbon feed rate, brand and type of carbon used, and carrier flue flowrate or pressure drop;

3. Discussion of test errors;
 4. Discussion of any deviations from the reference test methods; and
 5. Production data, including aluminum production rate and feed/charge rate.
- b. Facility Operations
1. Description of the process and control equipment in operation;
 2. Operating parameters of the process units and related equipment at the time of the test; and
 3. Facility operating parameters that demonstrate that the process units were operated at maximum production rates at the time of the test.
- c. Sampling and Analytical Procedures
1. Sampling port location(s) and dimensions of cross-section;
 2. Sampling point description, including labeling system;
 3. Brief description of sampling procedures, including equipment and diagram;
 4. Description of sampling procedures (planned and accidental) that deviated from any standard method;
 5. Brief description of analytical procedures, including calibration;
 6. Description of analytical procedures (planned or accidental) that deviated from any standard method; and
 7. Quality control/ quality assurance procedures, tests, and results.
- d. Appendix
1. Complete results with example calculations;
 2. Raw field data (original, not computer printouts);
 3. Laboratory report, with signed chain-of-custody forms;
 4. Calibration procedures and results;
 5. Raw process and control equipment data, signed by plant representative;
 6. Test log;
 7. Project participants and titles; and
 8. Related correspondence.

CERTIFICATE OF MAILING

I, Loretta Shatta, certify that I sent a Request to Provide

Information Pursuant to the Clean Air Act by Certified Mail, Return Receipt Requested, to:

William Elson
Fritz Products, Incorporated
255 Marion Road
River Rouge, Michigan 48218

I also certify that I sent a copy of the Request to Provide Information Pursuant to the
Clean Air Act by First-Class Mail to:

Teresa Seidel, District Supervisor
Michigan Department of Environmental Quality
Southeast Michigan District Office
27700 Donald Court
Warren, Michigan 48092-2793

On the 29 day of April 2016.

Loretta Shatta
Kathy Jones
AECAB, PAS

CERTIFIED MAIL RECEIPT NUMBER: 7009 1680 0000 7673 8354